

From: [Millie Thompson](#)
To: [Marlena Guajardo](#)
Cc: [Adolfo Ruiz](#); [Cindy Olivarri](#); [Patrick Bernal](#)
Subject: Re: FW: Castro v. Salinas - Deposition Date
Date: Tuesday, December 18, 2018 2:42:42 PM

You have my permission to sign for me.

On Tue, Dec 18, 2018 at 2:41 PM Marlena Guajardo <marlena.guajardo@rampage-sa.com> wrote:

Ms. Thompson:

Attached herein are the Joint Motion to Extend Deadlines and proposed Order for your review.

If they meet with your approval, please sign where indicated and return via email. Or, if you prefer, Adolfo can sign with permission.

Thank you,

Marlena Guajardo

Paralegal

Denton Navarro Rocha Bernal & Zech

A Professional Corporation

2517 N. Main Avenue

San Antonio, Texas 78212

(210) 874-6512 Direct

(210) 227-3243 Telephone

(210) 225-4481 Facsimile

CONFIDENTIALITY STATEMENT

This message is sent by a law firm and may contain information that is privileged or confidential. If you received this transmission in error, please notify the sender by reply e-mail and delete the

**Exhibit
A**

message and any attachments.

From: Adolfo Ruiz

Sent: Tuesday, December 18, 2018 2:10 PM

To: Millie Thompson <millieaustinlaw@gmail.com>

Cc: Patrick Bernal <patrick.bernal@rampage-sa.com>; Marlena Guajardo <marlena.guajardo@rampage-sa.com>; Cindy Olivarri <cindy.olivarri@rampage-sa.com>

Subject: RE: Castro v. Salinas - Deposition Date

My paralegal already has it and will forward to you shortly.



A Professional Corporation

Adolfo Ruiz

Senior Associate

2517 N. Main Avenue

San Antonio, Texas 78212

(210) 227-3243

(210) 225-4481 (Fax)

Email: adolfo.ruiz@rampage-sa.com

www.rampagelaw.com

CONFIDENTIALITY NOTICE

This transmission is intended for the individual or entity to which it is addressed, and may be information that is PRIVILEGED & CONFIDENTIAL. If you are not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient and have received this information in error, you are hereby notified that any dissemination, distribution or copying of this communication is prohibited. If you have received this communication in error, please notify us immediately by replying to the message and deleting it from your computer. Thank you.

From: Millie Thompson [<mailto:millieaustinlaw@gmail.com>]

Sent: Tuesday, December 18, 2018 2:09 PM

To: Adolfo Ruiz <adolfo.ruiz@rampage-sa.com>

Cc: Patrick Bernal <patrick.bernal@rampage-sa.com>; Marlana Guajardo <marlena.guajardo@rampage-sa.com>; Cindy Olivarri <cindy.olivarri@rampage-sa.com>

Subject: Re: Castro v. Salinas - Deposition Date

I agree to those dates. Do you want me to draft the joint motion, or do you guys have template to work from?

On Tue, Dec 18, 2018 at 2:08 PM Adolfo Ruiz <adolfo.ruiz@rampage-sa.com> wrote:

I would like to extend our expert designation for 30 days to January 22, 2019

And Dispositive motions 30 days as well to June 1, 2019

The dates for amendment of pleadings and discovery you propose look good.



A Professional Corporation

Adolfo Ruiz

Senior Associate

2517 N. Main Avenue

San Antonio, Texas 78212

(210) 227-3243

(210) 225-4481 (Fax)

Email: adolfo.ruiz@rampage-sa.com

www.rampagelaw.com

CONFIDENTIALITY NOTICE

This transmission is intended for the individual or entity to which it is addressed, and may be information that is PRIVILEGED & CONFIDENTIAL. If you are not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient and have received this information in error, you are hereby notified that any dissemination, distribution or copying of this communication is prohibited. If you have received this communication in error, please notify us immediately by replying to the message and deleting it from your computer. Thank you.

From: Millie Thompson [mailto:millieaustinlaw@gmail.com]

Sent: Tuesday, December 18, 2018 2:02 PM

To: Adolfo Ruiz <adolfo.ruiz@rampage-sa.com>

Cc: Patrick Bernal <patrick.bernal@rampage-sa.com>; Marlena Guajardo <marlena.guajardo@rampage-sa.com>; Cindy Olivarri <cindy.olivarri@rampage-sa.com>

Subject: Re: Castro v. Salinas - Deposition Date

Hi Adolfo,

The delay in receiving the order has thrown me off on this case. Can we agree to modify the scheduling order to extend the deadlines as follows:

Amend, supplement, join parties by January 30, 2019;

I'm ok with the expert deadline, but if you want to change it, I'll agree.

Complete Discovery by April 1, 2019.

Please let me know what you think,

Millie

On Tue, Dec 18, 2018 at 11:57 AM Adolfo Ruiz <adolfo.ruiz@rampage-sa.com> wrote:

Millie: We are looking at dates in January for Officer Salinas, we should have those dates soon.

For the Chief, I'll contact the City's Attorney to see how they will handle. I'll let you know.

What dates in January look good for you?

Also, we have 14 days for Defendant to file an answer after the Court's denial of our 12(b) Motion which is Dec 31st.

Would you agree to an agreed motion and order for the parties to amend pleadings by Dec 31st.

Please let me know and I'll have the motion and order drafted and sent to you. Thanks.



A Professional Corporation

Adolfo Ruiz

Senior Associate

2517 N. Main Avenue

San Antonio, Texas 78212

(210) 227-3243

(210) 225-4481 (Fax)

Email: adolfo.ruiz@rampage-sa.com

www.rampagelaw.com

CONFIDENTIALITY NOTICE

This transmission is intended for the individual or entity to which it is addressed, and may be information that is PRIVILEGED & CONFIDENTIAL. If you are not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient and have received this information in error, you are hereby notified that any dissemination, distribution or copying of this communication is prohibited. If you have received this communication in error, please notify us immediately by replying to the message and deleting it from your computer. Thank you.

From: Millie Thompson [mailto:millieaustinlaw@gmail.com]
Sent: Monday, December 17, 2018 2:32 PM
To: Patrick Bernal <patrick.bernal@rampage-sa.com>
Cc: Adolfo Ruiz <adolfo.ruiz@rampage-sa.com>
Subject: Castro v. Salinas - Deposition Date

Mr. Bernal,

Can you please send me 5 or 6 proposed dates for Officer Salinas's deposition this month and in January? Please also provide dates that would work for you for the deposition of the Olmos Park police chief.

Are you authorized to set-up the chief's deposition, or should I contact him directly?

Thank you.

--

In Resistance,

Millie L. Thompson, Attorney

Phone: (512) 293-5800 * Fax: (512) 682-8721

Please Note Our New Address: 1411 West Avenue, Ste. 100, Austin, Texas 78701

Privileged Attorney-Client Communication and/or Attorney Work Product

--

In Resistance,

Millie L. Thompson, Attorney

Phone: (512) 293-5800 * Fax: (512) 682-8721

Please Note Our New Address: 1411 West Avenue, Ste. 100, Austin, Texas 78701

Privileged Attorney-Client Communication and/or Attorney Work Product

--

In Resistance,

Millie L. Thompson, Attorney

Phone: (512) 293-5800 * Fax: (512) 682-8721

Please Note Our New Address: 1411 West Avenue, Ste. 100, Austin, Texas 78701

Privileged Attorney-Client Communication and/or Attorney Work Product

--

In Resistance,

Millie L. Thompson, Attorney

Phone: (512) 293-5800 * Fax: (512) 682-8721

Please Note Our New Address: 1411 West Avenue, Ste. 100, Austin, Texas 78701

Privileged Attorney-Client Communication and/or Attorney Work Product